

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

ILLINOIS COMMERCE COMMISSION,

On Its Own Motion,

**PROCEEDING PURSUANT TO SECTION
16-111(g) OF THE PUBLIC UTILITIES ACT
CONCERNING PROPOSED TRANSFER OF
GENERATING PLANT.**

NO. 03-0757

PETITION TO INTERVENE

Pursuant to 83 Ill. Adm. Code §200.200, the City of Champaign, Illinois, hereby petitions the Illinois Commerce Commission ("Commission") to be permitted to intervene as a party in the above-captioned proceeding. In support of its Petition, the City of Champaign states:

1. The City of Champaign is a municipal corporation of the State of Illinois, having its administrative offices at 102 North Neil Street, Champaign, Illinois 61820.
2. The City of Champaign is in the service area of Illinois Power Company, and is a customer of Illinois Power Company, as are its residents.
3. The City of Champaign has filed an informal complaint with the Illinois Commerce Commission concerning customer service and reliability issues in Illinois Power's provision of electric service to the residents and customers of the Champaign area.
4. The City of Champaign may be affected by the decision of the Commission in this docket.
5. For the purposes of this matter, the City of Champaign agrees to accept service pursuant to 83 Ill. Adm. Code §200.1050.

WHEREFORE, the City of Champaign requests that it be permitted to intervene and to be treated as a party to these proceedings pursuant to §200.200 of the Commission's Rules of Practice.

RESPECTFULLY SUBMITTED,

CITY OF CHAMPAIGN

By: _____
Frederick C. Stavins, City Attorney

City Attorney
City of Champaign
102 North Neil Street
Champaign, IL 61820
(217) 403-8765
frederick.stavins@ci.champaign.il.us

Dated: December ____, 2003

STATE OF ILLINOIS,)
) SS:
COUNTY OF CHAMPAIGN.)

VERIFICATION

I, Frederick C. Stavins, being first duly sworn, depose and say that I am the City Attorney for the City of Champaign, Illinois; that I have read the foregoing Petition to Intervene of the City of Champaign; and that the statements therein contained are true to the best of my knowledge, information and belief.

Frederick C. Stavins

SUBSCRIBED and SWORN TO before me,
a Notary Public, this ____ day of December, 2003.

NOTARY PUBLIC

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NOTICE OF FILING

PLEASE TAKE NOTICE that on this date, December 17, 2003, we filed with the Chief Clerk of Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois 62794-9280, the attached City of Champaign's Petition for Intervene via e-docket.

Frederick C. Stavins, City Attorney
City of Champaign, Illinois

CERTIFICATE OF SERVICE

I, Frederick C. Stavins, hereby certify that I served the above-identified documents upon all active parties of record on the attached service list on December 17, 2003, by electronic mail. Hard copies will be provided upon request.

Frederick C. Stavins, City Attorney

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